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Attorney for Defendant
JOSE CURIEL

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. 2:22-cr-000151-WBS
Plaintiff,)
v.) STIPULATION AND ORDER TO
JOSE CURIEL, ET AL) CONTINUE STATUS CONFERENCE AND
Defendants.) EXCLUDE TIME
)
) Date: August 28, 2023
) Time: 9:00 a.m.
)
)

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel, Assistant United States Attorney Justin Lee, counsel for plaintiff, Assistant Federal Defender Megan T. Hopkins, counsel for defendant Jose Curiel, and Clemente M. Jimenez, counsel for defendant Roberto Tostado-Cadenas, that the status conference scheduled for June 5, 2023, be continued to **August 28, 2023, at 9:00 a.m.**

Defense counsel continues to review discovery and conduct investigation in this case. The parties anticipate an initial plea offer from the government prior to the next status conference, and will require additional time to review the offer with the defendants and respond to the government. The parties believe a continuance to August 28, 2023, will permit defense counsel the additional time necessary to conduct pretrial investigation, identify and interview witnesses, obtain pertinent records, and engage in pre-plea negotiations.

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The parties agree that the ends of justice served by resetting the status conference date outweigh the best interest of the public and the defendant in a speedy trial. Therefore the parties agree that time is excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4).

Dated: June 1, 2023

Respectfully submitted,

HEATHER E. WILLIAMS
Federal Public Defender

/s/ Megan T. Hopkins
MEGAN T. HOPKINS
Assistant Federal Defender
Attorney for Defendant
JOSE CURIEL

Dated: June 1, 2023

/s/ Clemente M. Jimenez
CLEMENTE M. JIMENEZ
Attorney for Defendant
ROBERTO TOSTADO-CADENAS

Dated: June 1, 2023

PHILLIP A. TALBERT
United States Attorney

/s/ Justin Lee
JUSTIN LEE
Assistant United States Attorney
Attorney for Plaintiff

ORDER

IT IS HEREBY ORDERED that the preliminary hearing scheduled for June 5, 2023, at 9:00 a.m. is continued to **August 28, 2023, at 9:00 a.m.** The time period between through August 28, 2023, is excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(i) and (iv), as the ends of justice served by granting the continuance outweigh the best interest of the public and the defendant in a speedy trial.

Dated: June 1, 2023

William W. Shubert

WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE